

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CONTRARIAN CAPITAL MANAGEMENT,  
L.L.C., CONTRARIAN CAPITAL FUND I,  
L.P., CONTRARIAN DOME DU GOUTER  
MASTER FUND, LP, CONTRARIAN  
CAPITAL SENIOR SECURED, L.P.,  
CONTRARIAN EM II, LP, CONTRARIAN  
EMERGING MARKETS, L.P., BOSTON  
PATRIOT SUMMER ST LLC, POLONIUS  
HOLDINGS, LLC, E1 SP, A SEGREGATED  
ACCOUNT OF EMAP SPC, EMMA 1  
MASTER FUND, L.P., and CONTRARIAN  
FUNDS, L.L.C.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19 Civ. 11018 [rel. Nos. 19  
Civ. 3123 & 18 Civ. 11940]

Hon. Analisa Torres

**JOINT STIPULATION OF PARTIAL DISMISSAL WITHOUT PREJUDICE**

The parties to this action, through their respective counsel, and pursuant to Federal Rules of Civil Procedure 15(a)(2) and 41(a)(1)(A)(ii), hereby stipulate as follows:

1. The following claims in the following amounts for the following bonds are dismissed without prejudice:

<b>Plaintiff</b>	<b>Bond</b>	<b>Bond ISIN</b>	<b>Amount</b>
Contrarian Emerging Markets, L.P.	9.00% Bonds due 2023	USP17625AA59	\$113,517.00
Contrarian Emerging Markets, L.P.	9.25% Bonds due 2028	USP17625AB33	\$173,125.00
Contrarian Emerging Markets, L.P.	12.75% Bonds due 2022	USP17625AC16	\$4,390,027.00

<b>Plaintiff</b>	<b>Bond</b>	<b>Bond ISIN</b>	<b>Amount</b>
Contrarian Emerging Markets, L.P.	11.95% Bonds due 2031	USP17625AD98	\$4,459,937.00
Contrarian Emerging Markets, L.P.	8.25% Bonds due 2024	USP97475AP55	\$325,014.00
Contrarian Emerging Markets, L.P.	11.75% Bonds due 2026	USP17625AE71	\$16,660,324.00
Emma 1 Master Fund, L.P.	9.00% Bonds due 2023	USP17625AA59	\$7,783.00
Emma 1 Master Fund, L.P.	9.25% Bonds due 2028	USP17625AB33	\$11,875.00
Emma 1 Master Fund, L.P.	12.75% Bonds due 2022	USP17625AC16	\$301,073.00
Emma 1 Master Fund, L.P.	11.95% Bonds due 2031	USP17625AD98	\$305,863.00
Emma 1 Master Fund, L.P.	8.25% Bonds due 2024	USP97475AP55	\$22,286.00
Emma 1 Master Fund, L.P.	11.75% Bonds due 2026	USP17625AE71	\$1,142,576.00

2. Within three days of the date this Stipulation is so-ordered, Plaintiffs shall file and serve a Second Amended Complaint conforming to the dismissal of the claims listed in paragraph (1).

3. The Republic's answer on file to Plaintiffs' Corrected First Amended Complaint, Dkt. 34, shall be deemed as its answer to Plaintiffs' Second Amended Complaint.

4. This Stipulation is not intended to, and does not, impact either party's claims or defenses as to any other claims brought by any other Plaintiff, or as to any claims brought by Plaintiffs Contrarian Emerging Markets, L.P., and Emma 1 Master Fund, L.P., other than as to the bonds listed above in the amounts listed above.

5. The parties shall bear their own fees and costs incurred in the prosecution or defense of the claims dismissed pursuant to paragraph (1).

6. This Stipulation may be executed in separate counterparts, and counterparts may be executed in electronic form, each of which shall be an original.

Dated: May 1, 2020  
New York, New York

Respectfully submitted,

*/s/ Steven F. Molo*  
Steven F. Molo  
Justin M. Ellis  
Lauren F. Dayton  
MOLOLAMKEN LLP  
430 Park Avenue  
New York, NY 10022  
Tel: (212) 607-8160  
Fax: (212) 607-8161  
smolo@molorlamken.com

*Counsel for Plaintiffs*

*/s/ Joseph E. Neuhaus*  
Joseph E. Neuhaus  
Sergio J. Galvis  
James L. Bromley  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, NY 10004  
Tel: (212) 558-4000  
Fax: (212) 558-3588  
neuhausj@sullcrom.com

Angela N. Ellis  
1700 New York Avenue, N.W. Suite 700  
Washington, D.C. 20006-5215  
Tel: (202) 956-7500  
Fax: (202) 293-6330

*Counsel for Defendant*

SO ORDERED:

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Hon Analisa Torres, U.S.D.J.